

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PASHA ANWAR, et al.,	X	
	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Master File No. 09-CV-118 (VM)
	)	
FAIRFIELD GREENWICH LIMITED, et al.,	)	
	)	
Defendants.	)	
	)	
This Document Relates To: <i>Bhatia v. Standard</i>	)	
<i>Chartered International (USA) Ltd.</i> , No. 09-CV-	)	
2410; <i>Tradewaves Ltd. v. Standard Chartered</i>	)	
<i>International (USA) Ltd.</i> , No. 09-CV-9423	)	
	X	

**NOTICE OF UNIFIED MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Standard Chartered International (USA) Ltd.’s and Standard Chartered PLC’s (collectively, “Standard Chartered”) Motion To Dismiss the operative complaints in *Bhatia v. Standard Chartered International (USA) Ltd.*, No. 09-CV-2410 and *Tradewaves Ltd. v. Standard Chartered International (USA) Ltd.*, No. 09-CV-9423, dated March 10, 2010, Standard Chartered will move this Court, before the Honorable Victor Marrero, at a time and place to be determined by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order pursuant to Rules 12(b)(1), 12(b)(3), 12(b)(6) and 9(b)

of the Federal Rules of Civil Procedure dismissing with prejudice plaintiffs' complaints in their entirety, and for such further and other relief that the Court may deem just and proper.

Dated: New York, New York  
March 10, 2009

Respectfully submitted,

/s/ Sharon L. Nelles

Sharon L. Nelles  
Bradley P. Smith  
Patrick B. Berarducci  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
nelles@sullcrom.com  
smithbr@sullcrom.com  
berarduccip@sullcrom.com

Diane L. McGimsey  
(Pro Hac Admission Pending)  
SULLIVAN & CROMWELL LLP  
1888 Century Park East  
Los Angeles, California 90067  
mcgimseyd@sullcrom.com

*Attorneys for Defendants Standard  
Chartered International (USA) Ltd.  
and Standard Chartered PLC*